To: ctuers@blm.gov[ctuers@blm.gov]
Cc: Laumann, Sara[Laumann.Sara@epa.gov]; Jackson, Scott[Jackson.Scott@epa.gov]; Razzazian, Christopher[Razzazian.Christopher@epa.gov]; McCoy, Melissa[mccoy.melissa@epa.gov]
From: Russ, Timothy
Sent: Wed 10/12/2016 4:29:38 PM
Subject: NPL Draft Conformity Determination: EPA Comments (10/12/16)
NPL Draft Conformity Determination_EPA Comments_Track_Changes10-12-2016.docx

Hi Charis,

Thank you for providing the EPA with the opportunity to review the BLM's draft General Conformity Determination for the NPL project. We have reviewed the document and have provided recommended changes in the copy attached (with track changes as requested). In addition, our written comments below provide clarification of our recommendations to the document and address our request further information.

Please note that we were unable to complete our review of the draft General Conformity Determination as we did not receive Appendix A "General Conformity Emissions Calculations." This Appendix and the below requested copies of Wyoming Department of Environmental Quality (WDEQ) permits are necessary for us to be able to complete our review. These materials will help us to fully understand the basis of the calculated emissions that appear in Table 1 "Annual Emission Totals For General Conformity Development Scenario."

Once we receive the materials for Appendix A and the requested WDEQ permits, we will then be able to complete our review of the subject draft document and will advise you of any further comments for your consideration.

Our current comments are provided below:

1.) Section 1.0, "Introduction," third paragraph, first sentence: The reference to 40 CFR 93 Subpart B in this sentence should be replaced with reference to WAQSR Chapter 8, Section 3 instead. Because we approved those provisions into the Wyoming SIP on August 15, 2013 (78 FR 49685), they are now are the provisions that BLM must comply with as opposed to the provisions in 40 CFR 93 Subpart B.

2.) Section 1.0, "Introduction," third paragraph, second sentence: The reference to 40 CFR 93.153(b) is incorrect and should be replaced with WAQSR Chapter 8, Section 3(c)(iv)(A).

3.) Section 1.0, "Introduction," third paragraph, last sentence: We recommend that clarification be added to the last sentence as follows: "…any portion of the project or action that is required to be permitted under the State of Wyoming's New Source Review (NSR) program…" Also, the reference to 40 CFR 93.153(d) needs to be removed as WAQSR Chapter 8, Section 3 applies at this point in time.

4.) Section 3.0, "NPL Project Emissions," first paragraph, second sentence: Reference is made to a Wyoming Department of Environmental Quality (WDEQ) Air Quality Permit CT-8122A2 that was issued for the drill rigs. EPA would appreciate being able to have a copy of this permit (.pdf file is fine) to review the documented emissions and conditions contained in this permit. This will help further our understanding of how the NPL Jonah Energy drilling rigs are permitted and the conclusions used by the BLM in this draft general conformity determination.

5.) Section 3.0, "NPL Project Emissions," last paragraph: Several types of sources are listed as having their emissions removed from the general conformity analysis as they were permitted under WAQSR Chapter 6, Section 2 and those emissions were, therefore, excluded as per the provisions in WAQSR Chapter 8, Section 3. In order for us to further understand the permitting process, and the general conformity implications, EPA would appreciate receiving an example copy (.pdf file is fine) of a permit for each of the nine permit categories.

6.) Section 4.0, "General Conformity Analysis," second paragraph, list of emission sources: We note that non-road and mobile sources appearing in the list are correctly treated as temporary, non-road and mobile sources and are not permitted under an NSR permit under WAQSR chapter 6, Section 2. However, we are curious in that "Completion Rigs" and "Workovers," with their associated rig equipment are correctly considered non-road, temporary sources, yet drilling rigs are granted NSR permits. Please explain the difference.

7.) Section 4.0, "General Conformity Analysis," "Table 1. Annual Emission Totals for

General Conformity Development Scenario": As Appendix A "General Conformity Emissions Calculations" (from the Table of Contents) was not provided, we are unable to complete our review of the emission figures in this table that were used in the draft general conformity determination for the NPL project.

Again, thank you for the opportunity to review the BLM's draft General Conformity Determination for the NPL project. Please let us know if you have any questions and too, if you would like to arrange a conference call to discuss our recommendations for the document and our comments presented above.

Thanks!

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064
e-mail: russ.tim@epa.gov

From: "Tuers, Charis" <ctuers@blm.gov>
Date: September 21, 2016 at 5:03:13 PM EDT
To: "Strobel, Philip" <Strobel.Philip@epa.gov>, Angelique Diaz <Diaz.Angelique@epa.gov>
Cc: Phillip Blundell <pblundell@blm.gov>
Subject: NPL Draft Conformity Determination

Referred to BLM

Referred to BLM

Charis A. Tuers

Air Resource Specialist

Bureau of Land Management

Wyoming State Office

(307) 775-6099

ctuers@blm.gov